EXHIBIT A

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WHEREAS, on May 1, 2025, the Court issued Pretrial Order No. 26: Bellwether Trial Wave 1 Case Assignments and Discovery Schedule;

WHEREAS, Pretrial Order No. 26, which required the parties to exchange expert reports by August 8, 2025 and rebuttal expert reports by September 8, 2025, was modified by Stipulation and Court Order to require the parties to submit expert reports by August 22, 2025, and rebuttal expert reports by September 22, 2025 [ECF 3533];

WHEREAS, the parties agree certain fact discovery remains open for completion -- including a 30(b)(6) deposition on August 21, 2025 that is necessary for expert discovery;

WHEREAS, the parties agree that expert deadlines should be modified such that the exchange of expert reports should move from August 22, 2025 to August 29, 2025, and the exchange of rebuttal expert reports should move from September 15, 2025 to September 29, 2025;

WHEREAS, the parties agree that extending the aforementioned deadlines will not require extending any other deadlines set by Pretrial Order No. 26.

WHEREAS, the Court's Standing Order on Civil Jury Trials Section II(F)(1) regarding Expert Witnesses provides, in relevant part: "expert reports must be complete and sufficiently detailed. Illustrative animations, diagrams, charts and models may be used on direct examination only if they were part to the expert's report... By written stipulation, of course, all sides may relax these requirements."

WHEREAS, on June 3, 2025, the Parties indicated their intent to provide a stipulation relaxing these requirements to the Court. ECF 3157.

THEREFORE, the parties respectfully request the Court enter the parties' stipulation and that the following deadlines set by Pretrial Order No. 26 and modified by ECF 3533 be extended as follows:

- The parties shall exchange expert reports by August 29, 2025.
- The parties shall exchange expert rebuttal reports by September 29, 2025.

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28	STIPULATION TO RESET DEADLINES EXPERT DEMONSTRATIVES	S AND - 4 -		CASE NO. 3:23-MD-03084-CRB

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PROPOSED ORDER

IT IS SO ORDERED.

Dated: <u>August 15, 2025</u>

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